

January 21, 2022

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 5189 – 2022 Annual Energy Efficiency Program Plan
Responses to Record Requests January 2022 Hearings**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), attached please find the electronic version of the Company’s response to Record Request No. 5 issued at the Public Utilities Commission’s (“PUCs”) Evidentiary Hearing on January 13, 2022 in the above-referenced docket.¹

This filing also contains two motions: 1) *Motion of The Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission* and 2) *Motion of The Narragansett Electric Company d/b/a National Grid for Protective Treatment of Confidential Information*.

Please be advised that the Company’s Attachment RR-2A and Attachment RR-2B contains confidential information. An unredacted confidential version of this filing will be sent electronically to the Commission via the Company’s encryption software, Egress Switch.

This transmittal completes the Company’s responses to the record requests issued in this matter.

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 5189 Service List
John Bell, Division
Margaret Hogan, Esq.
Jon Hagopian, Esq.

¹ Per the Commission’s request, the Company is providing one copy of this transmittal for the Commission’s file in this docket and six (6) copies, 3-hole punched for the Commission.

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC CO. d/b/a)	
NATIONAL GRID'S 2022 ANNUAL)	
ENERGY EFFICIENCY PLAN)	DOCKET NO. 5189

MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC” or “Commission”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The records that are the subject of this Motion that require protective treatment from public disclosure is the Company’s Confidential Attachment January Record Request 5-2-A (“Attachment Jan RR 5-2-A”) and Confidential Attachment January Record Request 5-2-B (“Attachment Jan RR 5-2-B,” collectively, the “Confidential Attachments”) which were filed by the Company on January 21, 2022 in response to Record Request No. 5 issued by the Commission at the public hearing on January 13, 2022. The Company requests protective treatment of the Confidential Attachments in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

Attachment Jan RR 5-2-A consists of an internal report prepared by National Grid’s internal Rhode Island counsel concerning Company conduct relating to out of period lighting invoices as described in the Company’s response to PUC 5-4(e). Attachment Jan RR 5-2-B

consists of a draft Forensic Accounting Summary prepared at the direction of National Grid's internal counsel also pertaining to the lighting invoices as described in the Company's response to PUC 5-4(e).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act ("APRA"), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

II. BASIS FOR CONFIDENTIALITY

The Confidential Attachments, which are the subject of this Motion, are exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2. Specifically, Attachment Jan RR 5-2-A, was prepared by the Company's internal attorneys and consists of a power point slide deck which includes summaries of attorney-client communications. The report prepared by internal attorneys constitutes "records relating to a client/attorney relationship" that is exempt for public disclosure pursuant to § 38-2-2 (A)(I)(a) ("All records relating to a client/attorney relationship"). Not only was Attachment Jan RR 5-2-A prepared by Company attorney, it also includes attorney notes and recommendations made. Moreover, Attachment Jan RR 5-2-A also specifically names Company employees relating to out of date invoices. The disclosure of their names would "constitute a clearly unwarranted invasion of personal privacy . . ." and therefore is also exempt from public disclosure pursuant to § 38-2-2 (A)(I)(b).

Attachment Jan RR 5-2-B was prepared at the direction on the Company's internal attorneys. Because Attachment Jan RR 5-2-B was made at the direction of the Company's attorney in order to facilitate the attorney's legal representation, it should also be exempt from disclosure as a document relating to a client/attorney relationship. See § 38-2-2 (A)(I)(a); see also Voelker v. Deutsche Bank AG, No. 11-CV-6362 VEC, 2014 WL 4473351, at *1 (S.D.N.Y. Sept. 11, 2014) (“in the corporate context, the privilege may extend to communications among non-attorneys if they were made ‘at the direction of counsel, to gather information to aid counsel in providing legal services’”). Moreover, Attachment Jan RR 5-2-B is a working draft and work product that is exempt from disclosure pursuant to the APRA. See § 38-2-2 (K) (exempting “Preliminary drafts, notes, impressions, memoranda, working papers, and work products . . .” from public disclosure). Attachment Jan RR 5-2-B was not intended nor should be interpreted as a final product.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B.

Respectfully submitted,

NATIONAL GRID
By its attorney,

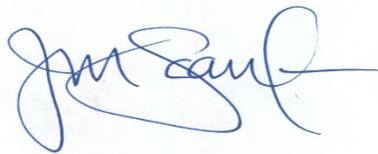


Andrew S. Marcaccio (#8168)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-4263

Dated: January 21, 2022

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 5189.



Joanne M. Scanlon

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC :
COMPANY d/b/a NATIONAL GRID : PUC Docket No. 5189
2022 ANNUAL ENERGY EFFICIENCY :
PROGRAM PLAN :

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY OBJECTING
TO RECORD REQUEST NO. 5 FROM THE PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby objects in part, pursuant to Section 1.19(C)(3) of the Public Utilities Commission (the “Commission” or “PUC”) Rules and Regulations, to the Commission’s Record Request No. 5 issued to National Grid at the January 13, 2022 public hearing in the above referenced docket. As grounds for its objection, the Company submits that its response to Record Request No. 5 is, in part, privileged attorney-client communications and attorney work product.

Background

The Company filed its 2022 Annual Energy Efficiency Program Plan on October 1, 2021. Thereafter, the PUC issued extensive data requests and held public hearings on five days in December 2021 and January 2022 to consider the Company’s proposals. On December 15, 2021, the PUC issued its Fifth Set of Data Requests to the Company. Specifically, PUC Data Request 5-4 sought information from the Company regarding any vendors abusing upstream incentives resulting in fraud or noncompliance with program rules. In the Company’s response to PUC 5-4 filed with the PUC on December 23, 2021,¹ the Company provided details regarding investigations conducted and actions the Company took to address two independent issues that came to its

¹ The complete set of the Company’s response to the PUC’s Fifth Set of Data Requests was filed on January 7, 2022.

attention: the first issue related to a manufacturer and three distributors of lighting products not following program rules, and the second issue concerned Company employees instructing the lighting manufacturer to hold back invoices until the next calendar (and energy efficiency budget) year. Following the Company's written response to PUC 5-4, at the PUC public hearing on January 13, 2022, the PUC issued Record Request No. 5. Record Request No. 5 seeks copies of any reports that resulted from the investigations discussed in the Company's response to PUC 5-4.

The Company has identified three documents that are responsive to Record Request No. 5: (1) a Matson Driscoll Damico LLP Forensic Accounting Report (the "MDD Report") prepared at the direction of outside counsel representing Massachusetts utilities National Grid, Eversource, Cape Light Compact, and Unitil concerning the lighting manufacturer/distributors alleged misconduct;² (2) an internal report prepared by National Grid's internal counsel concerning Company conduct relating to untimely lighting invoices (the "Internal Counsel Report");³ and (3) a draft Forensic Accounting Summary (the "Forensic Summary") prepared at the direction of National Grid's internal counsel also pertaining to the lighting invoices.⁴

The Company objects to Record Request No. 5 to the extent it seeks privileged attorney-client communications and attorney work product. The Company respectfully asserts that the MDD Report, Internal Counsel Report and Forensic Summary consist of privileged attorney-client communications and attorney work product protected from disclosure. The Company addresses

² National Grid, Eversource, Cape Light Compact, and Unitil signed a joint defense agreement with outside counsel. The MDD Report is Attachment Jan RR 5-1 for identification purposes only.

³ The Internal Counsel Report is Attachment Jan RR 5-2-A to the Company's response to Record Request No. 5.

⁴ The Forensic Summary is Attachment Jan RR 5-2-B to the Company's response to Record Request No. 5. The Company is also filing a spreadsheet that breaks down the calculations discussed in its response to PUC 5-4(e). The Company does not assert any privilege relating to this spreadsheet and will provide it to the PUC to be part of the public record. This spreadsheet is labeled as Attachment Jan RR 5-2-C to the Company's response to Record Request No. 5.

each of these documents in turn below. Through this motion, the Company seeks to: (1) withhold the MDD Report in its entirety; (2) file a redacted confidential version of the Internal Counsel Report which redacts attorney work product; and (3) file a redacted confidential Forensic Summary. Additionally, and in conjunction with this motion to object, the Company is filing a motion for protective treatment of the Internal Counsel Report because it is a document relating to a client/attorney relationship and contains individually identifiable records of Company employees, the disclosure of which would constitute an invasion of personal privacy. See R.I. Gen. Laws § 38-2-2 (A)(I)(a)-(b). The Company is also seeking protective treatment of the Forensic Summary because it is also a document relating to a client/attorney relationship, is work product and a preliminary draft which is excepted from the definition of public records contained in R.I. Gen. Laws § 38-2-2. See R.I. Gen. Laws § 38-2-2 (A)(I)(a) and (K).⁵

Analysis

Privileged Attorney-Client Communication

In order “to encourage full and frank communications between attorneys and their clients,” the Rhode Island Supreme Court has long recognized that “communications made by a client to his attorney for the purpose of seeking professional advice, as well as the responses by the attorney to such inquiries, are privileged communications not subject to disclosure.” DeCurtis v. Visconti, Boren & Campbell, Ltd., 152 A.3d 413, 423 (R.I. 2017) (quoting Mortgage Guarantee & Title Co. v. Cunha, 745 A.2d 156, 158–59 (R.I. 2000)). “Genuine attorney-client communications are afforded the highest level of protection by our courts.” Id. the party asserting the privilege must set forth the following elements:

⁵ The basis for seeking confidential treatment of these documents is discuss in greater detail in the Company’s Motion Seeking Confidential Treatment of Record Request Attachments 5-2-A and 5-2-B.

(1) the asserted holder of the privilege is or sought to become a client; (2) the person to whom the communication was made (a) is [the] member of a bar of a court, or his subordinate and (b) in connection with this communication is acting as a lawyer; (3) the communication relates to a fact of which the attorney was informed (a) by his client (b) without the presence of strangers (c) for the purpose of securing primarily either (i) an opinion on law or (ii) legal services or (iii) assistance in some legal proceeding, and not (d) for the purpose of committing a crime or tort; and (4) the privilege has been (a) claimed and (b) not waived by the client.

DeCurtis, 152 A.3d at 423 (internal citations and quotations omitted)

Attorney Work Product

While the attorney-client privilege covers only confidential communications between attorney and client, the work-product privilege, on the other hand, “protects both the attorney-client relationship and a complex of individual interests particular to attorneys that their clients may not share.” State v. von Bulow, 475 A.2d 995, 1009 (R.I. 1984) (quoting In Re Sealed Case, 676 F.2d at 809)). The work product doctrine protects certain materials “obtained or prepared by an adversary’s counsel with an eye toward litigation” State v. von Bulow, 475 A.2d 995, 1008 (R.I. 1984) (quoting Hickman v. Taylor, 329 U.S. 495 (1947)).

The Rhode Island Supreme Court has recognized that there are two types of work product: opinion work product and factual work product. DeCurtis v. Visconti, Boren & Campbell, Ltd., 152 A.3d 413, 427–28 (R.I. 2017) (citing Henderson v. Newport Cty. Reg’l Young Men’s Christian Ass’n, 966 A.2d 1242, 1247-48) (R.I. 2009). Opinion work product “refers to a document or other written material containing the mental impressions of an attorney or his or her legal theories” and receives “absolute immunity from discovery.” Id. at 428. Factual work product casts a wider net and covers “any material gathered in anticipation of litigation.” Id. “Because factual work product does not include the actual thoughts of the attorney, it is afforded only qualified immunity from discoverability.” Id.

Factual work product is only subject to disclosure when “the party seeking discovery demonstrates a substantial need for the materials and that it cannot obtain the substantial equivalent without undue hardship.” DeCurtis, 152 A.3d at 428 (quoting Crowe Countryside Realty Associates, Co., LLC v. Novare Engineers, Inc., 891 A.2d 838, 842 (R.I. 2006)). Factual work product encompasses any material gathered in anticipation of litigation. Importantly, it is not necessary for the attorney to have prepared the materials or the documents for them to constitute work product. Rather, a document prepared by a party’s representative or agent constitutes factual work product as long as the document was prepared in anticipation of litigation. Henderson v. Newport Cty. Reg’l Young Men’s Christian Ass’n, 966 A.2d 1242, 1248 (R.I. 2009). Additionally, work product privilege “applies not only to litigation in courts, but litigation before administrative tribunals.” S. Union Co. v. Sw. Gas Corp., 205 F.R.D. 542, 549 (D. Ariz. 2002) (quoting United States v. Am. Telephone & Telegraph Co., 86 F.R.D. 603, 627 (D.D.C. 1979)).

Applying this legal framework to the facts of this proceeding, the MDD Report, the Internal Counsel Report, and the Forensic Summary should all be treated as privileged because they constitute attorney-client communications and/or attorney work product. The Company addresses each report in turn below.

The MDD Report

The MDD Report was prepared by a forensic accounting firm at the direction of outside counsel. Outside counsel, in the scope of its investigation into the alleged misconduct concerning a lighting manufacturer and lighting distributors, hired MDD to complete a forensic analysis to aid him in providing legal services to the utilities involved, including the Company and certain Massachusetts utilities. See Voelker v. Deutsche Bank AG, No. 11-CV-6362 VEC, 2014 WL 4473351, at *1 (S.D.N.Y. Sept. 11, 2014) (“in the corporate context, the privilege may extend to

communications among non-attorneys if they were made ‘at the direction of counsel, to gather information to aid counsel in providing legal services’”); see also Adkisson v. Jacobs Eng’g Grp., Inc., No. 3:13-CV-505-TAV-HBG, 2021 WL 149841, at *6 (E.D. Tenn. Jan. 15, 2021) (similar). MDD’s communication to outside counsel in the form of its investigatory report, constitutes privileged communications. Outside counsel needed to understand the facts surrounding the alleged misconduct so that he could properly represent the Massachusetts utilities.

Moreover, the MDD Report should be immune from disclosure because it is factual attorney work product prepared at the direction of outside counsel in anticipation of regulatory proceedings. Henderson v. Newport Cty. Reg’l Young Men’s Christian Ass’n, 966 A.2d 1242, 1248 (R.I. 2009) (factual work product “encompasses any material gathered in anticipation of litigation” and “[i]t is not necessary for the attorney to have prepared the materials or the documents for them to constitute work product”); State v. Lead Indus. Ass’n, Inc., 64 A.3d 1183, 1193 (R.I. 2013) (factual work product “may apply even to nonattorneys”); Judicial Watch, Inc. v. U.S. Dep’t of Homeland Sec., 736 F.Supp.2d 202, 209 (D.D.C. 2010) (noting that attorney work-product protection applies to “materials prepared by . . . non-attorneys supervised by attorneys”).

Pursuant to the qualified privilege afforded to factual work product, the MDD Report is subject to disclosure *only if* the PUC as the party seeking its discovery could: (1) demonstrate a substantial need for the materials; and (2) “that it cannot obtain the substantial equivalent without undue hardship.” DeCurtis, 152 A.3d at 428. The Company respectfully submits that the PUC cannot meet this second prong because the PUC can avail itself of the administrative discovery process by issuing additional data and record requests, or by continuing the public hearing to gather additional information regarding the Company’s investigative findings. The Company does not dispute that the PUC has the authority to discover all the facts surrounding the reported and

discovered misconduct relating to the lighting manufacturer and distributors, and the Company stands prepared to assist in any continuing discovery process to minimize any burden in the Commission seeking information it needs to perform its duties. The Company's objection is limited to disclosing a report prepared at the direction of outside counsel in his role representing four utilities, all of whom may also have claims of privilege. The Company cannot unilaterally waive these privileges. Accordingly, the Company objects to Record Request No. 5 to the extent it seeks disclosure of privileged information contained within the MDD Report.

Internal Counsel Report

The Internal Counsel Report was prepared by the Company's internal attorneys and consists of a power point slide deck which includes summaries of attorney-client communications. These attorney-client communications are privileged. See DeCurtis, 152 A.3d at 423. The communications summarized and captured in the Internal Counsel Report relate to facts disclosed to internal counsel by Company employees to assist the Company in obtaining legal advice and to assist in future legal administrative proceedings and adjudication. See id.

Because the Company is mindful that the PUC is seeking to review additional documents concerning the untimely invoices, the Company proposes that instead of withholding the entirety of the privileged Internal Counsel Report, the Company produce the Internal Counsel Report, subject to a motion for protective treatment,⁶ with the attorney-client communications and opinion work product completely redacted. What will remain in the Internal Counsel Report will be screen shots of Company employees' emails relevant to the issue and next steps. By providing this redacted report to the PUC, the Company submits that it has not waived any of its privileges. The

⁶ As noted, the Company is filing a motion for protective treatment of certain sections of the Internal Counsel Report that contain individually identifiable records of Company employees, the disclosure of which would constitute an invasion of personal privacy, R.I.G.L. § 38-2-2 (A)(I)(b).

production of the redacted Internal Counsel Report is intended only to provide the PUC the material emails and related documents that the Company gathered in the course of its investigation without disclosing any attorney-client communications and work product. The Company believes that this is the most expeditious manner to provide a response to the PUC's record request without unnecessary delay and complication associated with regathering employee emails to respond to a modified discovery request from the Commission. In short, the Company seeks to work cooperatively to facilitate the PUC's review of the relevant issues without waiving the privileges that the Company holds. The Company's does not dispute the PUC's authority and duty to investigate what occurred regarding the improper invoicing.

Forensic Summary

The Forensic Summary was prepared at the direction of counsel to gather information to aid in providing legal services. See Voelker, No. 11-CV-6362 VEC, 2014 WL 4473351, at *1. Specifically, the Forensic Summary was necessary for the Company's internal counsel to assess the scope of the misconduct it discovered concerning untimely invoices and to be able to provide legal opinion on the next steps needed to correct any existing Energy Efficiency accounting and prepare for future regulatory proceeding. As noted, the Forensic Summary is a working draft and was not intended nor should be interpreted as a final product.

Notwithstanding the Company's objection, in an effort to provide the PUC information surrounding the out of period invoices, the Company has filed a redacted Forensic Summary.⁷

⁷ As noted, the Company will seek protective treatment of the entirety of the Forensic Summary because it as a document relating to a client/attorney relationship, work product and a preliminary draft. See R.I.G.L. § 38-2-2 (A)(I)(a) and (K).

For the reasons discussed herein, the Company objects, in part, to the PUC's Record Request No. 5 to the extent it seeks privileged attorney client communications and attorney work product.

Respectfully submitted,

NATIONAL GRID
By its attorney,

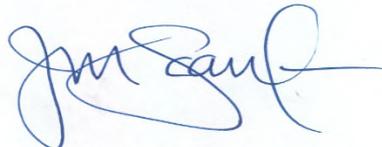


Andrew S. Marcaccio (#8168)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-4263

Dated: January 21, 2022

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 5189.

A handwritten signature in blue ink, appearing to read "Joanne Scanlon", is written over a light blue rectangular background.

Joanne M. Scanlon

January Hearings - Record Request No. 5

Request:

Please provide any reports the Company received or has done related to the items of noncompliance described in the Company's response to PUC 5-4

Response:

Part 1 – Manufacturer Non-Compliance:

The Company has identified one responsive record, referred to as "Attachment Jan RR 5-1" for identification purposes, related to the subject matter of noncompliance with certain program rules by one program participant serving as a manufacturer/distributor of energy efficient lighting products as described in the Company's response to PUC 5-4(a). The Company is asserting legal privilege to Attachment Jan RR 5-1. See Motion of the The Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission.

Part 2- Out-Of-Period Invoices:

The Company has identified two responsive records, referred to as "Attachment Jan RR 5-2-A" and "Attachment Jan RR 5-2-B" for identification purposes, related to the subject matter of out-of-period invoices as described in the Company's response to PUC 5-4(e). The Company is asserting legal privilege for Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B. See Motion of the The Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission.

Notwithstanding the Company's objection, in an effort to provide the Public Utilities Commission ("PUC") with the information contained in Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B without providing legally privileged documents, the Company has attached redacted versions of Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B. Please note redacted Attachment Jan RR 5-2-A and redacted Attachment Jan RR 5-2-B are confidential and the Company is seeking protective treatment from public disclosure. In addition, the Company has attached an Excel spreadsheet, referenced as Attachment Jan RR 5-2-C, which shows the impact to the shareholder incentive after placing the out-of-period invoices back into the appropriate rebate payment year as described in the Company's response to PUC 5-4(e).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5189
In Re: 2022 Annual Energy Efficiency Plan
Responses to Record Requests
Issued at the Commission's Evidentiary Hearings
On January 10, 11, and 13, 2022

Attachments RR-5

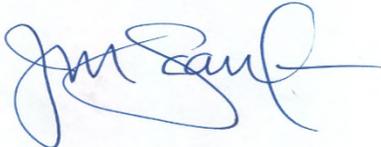
REDACTED

The Company is providing an Excel version of Attachment RR 5-2-C

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

January 21, 2022
Date

**Docket No. 5189 - National Grid – 2022 Annual Energy Efficiency Program
Service list updated 12/15/2021**

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